

Message

From: Allen, Elizabeth [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5E7BDB078EA544C3939CE6E375FDE197-ALLEN, ELIZABETH]
Sent: 5/20/2020 5:50:55 PM
To: POULSEN Mike [Mike.POULSEN@state.or.us]
Subject: RE: Bradford Island

OMG, this is such a painful discussion!!!

From: POULSEN Mike <Mike.POULSEN@state.or.us>
Sent: Wednesday, May 20, 2020 8:27 AM
To: Allen, Elizabeth <allen.elizabeth@epa.gov>
Subject: RE: Bradford Island

Elizabeth —

This is the first document I found, from about three years ago. A quick read indicates that I over-simplified the Corps' position. They apparently call chemicals >1E-6 COCs, but they focus on risk drivers. That is where the disagreement occurs. They are not really planning to remediate to 1E-6. They may end up remediating areas, just not as a CERLA action. If they do not call 1E-6 an ARAR, we lack a mechanism to require action.

Mike

From: POULSEN Mike
Sent: Wednesday, May 20, 2020 8:13 AM
To: 'Allen, Elizabeth' <allen.elizabeth@epa.gov>
Subject: RE: Bradford Island

DEQ has certainly commented on this for the last few years. And attorneys have discussed the matter, with no resolution. I'll see what I can dig up.

Mike

From: Allen, Elizabeth <allen.elizabeth@epa.gov>
Sent: Wednesday, May 20, 2020 8:11 AM
To: POULSEN Mike <Mike.POULSEN@state.or.us>
Subject: RE: Bradford Island

Thank you! Do you have a document that, well, documents that? 😊

From: POULSEN Mike <Mike.POULSEN@state.or.us>
Sent: Wednesday, May 20, 2020 8:05 AM
To: Allen, Elizabeth <allen.elizabeth@epa.gov>
Subject: RE: Bradford Island

Sorry, I was responding to what Oregon does. The Corps is using 1E-4 for Bradford. That is the conflict. We would identify more COCs and areas with unacceptable risk.

Mike

From: Allen, Elizabeth <allen.elizabeth@epa.gov>
Sent: Wednesday, May 20, 2020 8:00 AM
To: POULSEN Mike <Mike.POULSEN@state.or.us>
Subject: RE: Bradford Island

So the Corps is using 10^{-6} as the threshold for COCs, and setting cleanup goals at a 10^{-6} risk per the NCP and OAR? BTW, the Corps does not consider the Oregon rule to be an ARAR.

From: POULSEN Mike <Mike.POULSEN@state.or.us>
Sent: Wednesday, May 20, 2020 7:53 AM
To: Allen, Elizabeth <allen.elizabeth@epa.gov>
Subject: RE: Bradford Island

Elizabeth —

For HH, COCs are those with excess cancer risk $>1E-6$, or $HQ > 1$. A little more complicated if $HI > 1$ because those with $HQ < 1$ can contribute. But I think the main issue is cancer. $1E-6$ is the answer in Oregon. Not $1E-5$, or $1E-4$.

Mike

From: Allen, Elizabeth <allen.elizabeth@epa.gov>
Sent: Wednesday, May 20, 2020 7:50 AM
To: POULSEN Mike <Mike.POULSEN@state.or.us>
Subject: RE: Bradford Island

Sorry, I am stuck on another call. Quick question: What is the threshold for selecting COCs for the FS? Is it any chemical for which the risk exceeds 10^{-6} , or 10^{-4} ?

-----Original Message-----

From: POULSEN Mike <Mike.POULSEN@state.or.us>
Sent: Wednesday, May 20, 2020 7:43 AM
To: Allen, Elizabeth <allen.elizabeth@epa.gov>
Subject: RE: Bradford Island

OK, that didn't work. Try calling me at Ex. 6 Personal Privacy (PP) Happy to talk about Bradford.

Mike

-----Original Message-----

From: Allen, Elizabeth <allen.elizabeth@epa.gov>
Sent: Wednesday, May 20, 2020 7:32 AM
To: POULSEN Mike <Mike.POULSEN@state.or.us>
Subject: Bradford Island

Could you give me a call please? We have a call with the Corps this morning, and I have a couple of questions...